

**United States District Court  
for the Eastern District of New York**

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**UNITED STATES OF AMERICA,**

VS.

Crim. Case #  
17CR00224(PKC)

RICHARD K. LAI,

Defendant.

-x

**MOTION FOR LEAVE TO WITHDRAW AS  
ATTORNEY FOR DEFENDANT**

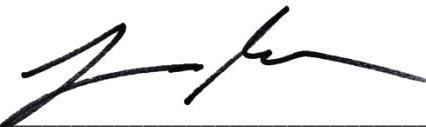
COMES NOW Leonardo M. Rapadas, counsel for defendant Richard K. Lai (hereinafter "Mr. Lai") and requests leave of court to withdraw as counsel. In support of this motion, counsel states the following:

1. I have represented Mr. Lai since the inception of this case through his guilty pleas;
  2. Sentencing has been rescheduled several times since that time;
  3. The United States has most recently filed for an adjournment for a date in October of 2022;
  4. During his release pending sentencing, I have been making requests for modification of his release conditions;
  5. In March of 2018, I rejoined the Guam Office of the Attorney General (hereinafter "GOAG");
  6. As of this writing, I am still with the GOAG and am unable to continue my representation of Mr. Lai;
  7. I have assisted Mr. Lai in procuring new counsel for the purpose of further representation and sentencing;

- 1       8. It is my understanding that such counsel has agreed to take over the issues of modification of his
- 2              release conditions and sentencing;
- 3       9. I have communicated with his new counsel and I understand he will be processing his pro hac
- 4              vice application very soon to practice before this court;
- 5       10. I have discussed this with Mr. Lai and he understands the situation;
- 6       11. I have informed government counsel;
- 7       12. Considering this, and in furtherance of justice, it is respectfully submitted that Leonardo M.
- 8              Rapadas be permitted to withdraw as counsel and his designation as a notified party be removed
- 9              once he is officially removed as counsel for the defendant.

10              **WHEREFORE**, undersigned counsel respectfully requests leave to withdraw as counsel for  
11              defendant and for such other and further relief as the Court deems just and proper.

12              Respectfully submitted this 26<sup>th</sup> day of May, 2022.



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15              LEONARDO M. RAPADAS  
16              Attorney for Richard K. Lai  
17              [leonardo.rapadas@gmail.com](mailto:leonardo.rapadas@gmail.com)